

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

JANE DOE on behalf of M.F., §  
*Plaintiff,* §  
§  
V. § CIVIL ACTION NO. 4:19-CV-1297  
§  
HARRIS COUNTY PRECINCT SIX § JURY DEMAND  
CONSTABLE SYLVIA TREVINO, ET AL. §  
*Defendants.* §

**INDEX OF MATTERS FILED UPON REMOVAL**

The following documents appear in the file of the case styled *Jane Doe, on behalf of M.F. v. Harris County, et al.*, Cause No. 2019-19321, in the 281<sup>st</sup> Judicial District Court of Harris County, Texas, certified copies of which are attached<sup>1</sup>:

1. Docket Sheet
2. Plaintiff's Original Petition
3. Civil Process Pick-up Form
4. Return of Service for Constable Sylvia Trevino
5. Refused acceptance of citation for Brandin Gilspy<sup>2</sup>
6. Certified Mail Tracking and Receipts

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<sup>1</sup> As of the time of this filing, the State District Court file does not contain all of the executed process in this case and therefore cannot be filed at this time. Defendants will supplement this filing, if and when they are filed in the state court.

<sup>2</sup> Brandin Gilspy is currently in jail at a TDCJ unit -- he is not at 3900 Canal Street, Houston, Texas (the address to which his citation was issued). This is the address for Harris County Constable Precinct 6.

Respectfully submitted,

OF COUNSEL:

VINCE RYAN  
HARRIS COUNTY ATTORNEY

/s/ *Laura Beckman Hedge*  
LAURA BECKMAN HEDGE  
Assistant County Attorney  
State Bar No. 00790288  
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[Laura.Hedge@cao.hctx.net](mailto:Laura.Hedge@cao.hctx.net)

**ATTORNEY FOR DEFENDANTS  
HARRIS COUNTY & HARRIS COUNTY  
CONSTABLE SYLVIA TREVINO**

**CERTIFICATE OF SERVICE**

I hereby certify that on April 9, 2019, a true and correct copy of the foregoing was served pursuant to the Federal Rules of Civil Procedure to:

**Attorneys for Plaintiff**

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/s/ *Laura Beckman Hedge*  
LAURA BECKMAN HEDGE  
Assistant County Attorney

**HCDistrictclerk.com**

JANE DOE (ON BEHALF AND ALSO KNOWN AS M F)

4/9/2019

vs. TREVINO, SYLVIA

Cause: 201919321 CDI: 7 Court: 281

**DOCUMENTS**

Number	Document	Post Jdgmt	Date	Pgs
84714207	Return Mail Undeliverable		04/01/2019	19
84714203	Citation		03/29/2019	2
84649037	Certified Mail Receipt		03/27/2019	1
84649038	Certified Mail Receipt		03/27/2019	1
84649041	Certified Mail Receipt		03/27/2019	1
84589909	Certified Mail Tracking # 7018 2290 0001 3523 5776		03/25/2019	2
84589914	Certified Mail Tracking # 7018 2290 0001 3523 5783		03/25/2019	2
84589917	Certified Mail Tracking # 7018 2290 0001 3523 5769		03/25/2019	2
84367159	Civil Process Request		03/18/2019	3
84350765	Original petition jury demand and request for disclosure		03/15/2019	16

# 2019-19321 / Court: 281

CAUSE NO.\_\_\_\_\_

JANE DOE on behalf of M.F.,  
*Plaintiff*

v.

HARRIS COUNTY PRECINCT SIX  
CONSTABLE SYLVIA TREVINO,  
BRANDIN GLISPY, and HELIODORO  
MARTINEZ,  
In their individual capacities,  
HARRIS COUNTY, and THE LYND  
COMPANY,  
*Defendants*

§ IN THE DISTRICT COURT

\_\_\_\_\_ TH JUDICIAL DISTRICT

HARRIS COUNTY, TEXAS

## ORIGINAL PETITION, JURY DEMAND AND REQUEST FOR DISCLOSURE

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, Plaintiff, Jane Doe on behalf and also known as M.F. ("Doe") in the above-styled and numbered cause, and files this, her Original petition, complaining of Harris County Constables Sylvia Trevino ("Trevino"), and Heliodoro Martinez ("Martinez") in their individual capacities and former Harris County Precinct Six Deputy Constable, Brandin Glispy ("Glispy"), in his individual capacity and The Lynd Company ("Lynd") for cause of action would show as follows:

### I. INTRODUCTION

Former Juvenile Detention Officer and Harris County constable sexually assaulted multiple women, including Pregnant woman during a traffic stop. He was hired by Constable Heliodoro Martinez, He remained on the job as a Deputy, for Constable Sylvia Trevino and worked as an off-duty officer for Lynd Property Management,

each were aware of the complaints by other women of sexual abuse, but failed to terminate or report him for his proclivities which allowed his spree to continue. Glispy's misdeeds were ultimately reported by his victim herein, he tried and convicted of sexual assault and sentenced to 8 yrs in TDCJ. Glispy is one of two Harris County Precinct Six Deputy Constables recently accused of sexually assaulting woman while acting under the color of law, Edward Joe Mata was the latest deputy indicted. The Plaintiff has suffered extreme pain and suffering, and mental anguish as a result of the defendants actions, and inactions.

## II. JURISDICTION AND VENUE

1. The subject matter in controversy is within the jurisdictional limits of this court. This court has jurisdiction over the parties because Defendants are Texas residents.
2. Venue is proper because all Defendants in this action are residents of Harris County, Texas or do business in this State. Venue is also proper because a substantial part of the events or omissions giving rise to the Plaintiffs' claims occurred in this judicial district—i.e., at 5800 Martin Luther King Drive, Houston, Texas 77021. Therefore, venue is proper.
3. All conditions precedent to filing this lawsuit have been met.

## III. PARTIES

4. The Plaintiff, M.F., Doe herein is an individual who resides in Harris County, Texas.

5. Defendant, Sylvia Trevino was at all times relevant to this action the duly elected Constable of Harris County Texas. She was employed by Harris County as a Constable of the Harris County Constable's office. Defendant, Sylvia Trevino is sued in her individual capacity, acting under color of law. Constable Trevino is a "person" under 42 U.S.C. § 1983 and at all times relevant to this case acted under color of law. She is a county policy maker with respect to policies, custom, practices and procedures at the Harris County Constable's Office. Defendant, Harris County Constable Sylvia Trevino was acting in the course and scope of her employment with defendant, Harris county as a constable caused the injuries which are the subject of the claim; She may be served with process wherever she may be found.

6. Defendant, Harris County is a unit of local government organized under the laws of the State of Texas. Defendant is a "person" under 42 U.S.C. § 1983 and at all times relevant to this case acted under color of law. Harris County may be served with process by serving the duly elected County Judge of Harris County, Lina Hidalgo, at , Houston, Texas 77002.

7. Defendant, Heliodoro Martinez is a former employee of the Harris County Constable, he is being sued in his individual capacity, as a supervisor, who was acting in the course and scope of his employment with defendant, Harris county. He is an individual while acting under color of law and acting in his individual capacity

as a deputy constable and supervisor of Brandin Gilspy, acting in the course and scope of his duties caused the injuries which are the subject of the claim; may be served with process wherever he may be found.

8. Defendant, Lynd Company, is a management company that can is located at 8000 INTERSTATE HIGHWAY 10 #1200 SAN ANTONIO TX; Defendant, Lynd Company may be served with process through its registered agent SECRETARY OF THE STATE, 30 TRINITY STREET, HARTFORD, CT 06106-1634.

9. Defendant, Brandin Glipsy is a former employee of the Harris County Constable, he is being sued in his individual capacity, who was acting in the course and scope of his employment with defendant, Harris county. He is an individual while acting under color of law and acting in his individual capacity as a deputy constable caused the injuries which are the subject of the claim; may be served with process and may be served with process wherever he may be found.

#### IV. FACTS

10. The Plaintiff was a pregnant mother looking forward to the upcoming birth of her third child.

11. On or about April 24, 2017 at 9 pm a Harris County Constable Brandin Glispy sexually assaulted the pregnant woman during the course of what was suppose to be a routine traffic stop in Houston in 2017.

12. Constable Glispy was driving a marked patrol car with insignia of the Constable office.

13. The driver was advised the reason or purpose for the traffic stop was she had a broken headlight, as is required by law.
14. Rather than give her a ticket he told the expecting mother to stand outside of the vehicle in the 5800 block of Martin Luther King, but eventually allowed to her leave without a ticket or warning.
15. Constable Glispy then stopped her a second time but he saw people milling about so he allowed her to continue on.
16. He stopped her a third time and directed her to a dark secluded gravel lot next to an abandoned building.
17. Concerned but wanting to comply with the officer's command she pulled into the dark parking lot.
18. The officer then used his constable vehicle to obstruct the view of the woman from the street traffic.
19. He exited his vehicle wearing his full uniform, including his gun.
20. He also requested she perform oral sex; however, she refused.
21. Constable Glispy began to frisk the female detainee
22. He became to grope her body then penetrate her vagina.
23. Shocked by what was happening to her she looked for a badge number or name but neither was visible.
24. During the entire exchanged he managed to conceal his name and number badge.

25. After he was finished, but before he allowed her to leave, he hand wrote his phone number on a piece of paper from his constable notepad and provided it to the pregnant woman.
26. Although she was upset, she gladly accepted his phone number for the purpose of identifying him later.
27. She was allowed to leave without further incident.
28. No arrest, no citation, no paperwork noting that the detention ever took place.
29. The Plaintiff still in shock arrived home and immediately called 911 and reported the sexual assault to the operator.
30. Deputy Glispy was arrested and later charged with sexual assault on July 5, 2017.
31. At trial, a jury sentenced Glispy to eight years in prison.
32. It took less than 3 hours to reach a verdict.
33. According to prosecutors Brandin Glispy assaulted at least two women in the six months he was on the job.
34. There may be more women assaulted by Gilspy, since he worked at the juvenile detention center, and for Houston Housing authority .
35. Gilspy had a reputation around Heatherbrook apartments where he held an off duty extra job assignment of sexually harassing female tenants.
36. Four months earlier in January 2017, the deputy cornered another woman in the restroom of a Popeye's chicken restaurant.

37. He sexually assaulted her, and then attempted to force his first known victim to perform oral sex, prosecutors said.

38. Then she was able to get away, and she testified against Glispy during the punishment phase of his trial for the sexual assault of the Plaintiff.

39. She also reported his actions to Heatherbrook apartment management, Lynd.

40. Although the victim in the previous incident of sexual assault reported to Lynd management, nothing was done to Glispy; he was allowed to stay out there and hunt for other women.

41. The county inaction amounted to ratifying, accepting and condoning the criminal conduct of Glispy.

42. With a license to continue, Glispy sexually assaulted the pregnant The Plaintiff.

43. He remained on duty for three additional days after the last allegation.

44. Lynd Company concealed the sexaul harrasment and assualt allegations against Gilspy, thereby ratifying his conduct.

45. Defendants are jointly and severally liable for the injuries and damages sustained by Plaintiff.

**V. BRANDIN GLISPY LIABILITY FOR CIVIL RIGHTS VIOLATIONS UNDER SECTION 1983**

46. Plaintiff incorporates herein the facts in the preceding numbered-paragraph four.

47.

**VI. HARRIS COUNTY LIABILITY CIVIL RIGHTS VIOLATIONS UNDER SECTION 1983**

48. Plaintiff incorporates herein the facts in the preceding paragraphs.
49. Failure to train, or re-train, failure to discipline

**VII. RATIFICATION--HARRIS COUNTY**

50. Plaintiff incorporates herein the facts in the preceding paragraphs.
51. Harris County fully investigated the sexual assault allegations of Glispy, including the assault in January 2017 in the Popeye's restaurant, yet it did nothing to discipline any of their employees involved.
52. Despite certainly knowing of the outrageous behavior of Brandin Glispy sexually assaulting and stalking another female nothing was done to discipline anyone involved thereby constituting ratification of the actions and inactions.

**VIII. HARRIS COUNTY'S LIABILITY UNDER MONELL CLAIM, CUSTOM, POLICY, PATTERN AND PRACTICE**

53. Plaintiff incorporates herein the facts in the preceding paragraphs.
54. Brandin Glispy committed the same type of wrongful sexual conduct and had the propensity for engaging in future sexual misconduct.
55. Harris County was informed of the previous sexual assault in the Popeye's Restaurant and did nothing to Brandin Glispy in January 2017 when they were informed and placed on notice of the first sexual assault.
56. Yet, Harris county did nothing to Brandin Gilspy; resulting in the additional sexual assaults. Harris County ratified and condoned the sexual conduct of Constable Glispy.

57. Harris County has a custom, policy, practice and procedure of condoning criminal conduct of its deputies including the stopping and frisking of citizens, without probable cause or a reasonable suspicions of a criminal violation of the law or the sexual misconduct.

58. Failing to adequately train or re-train or regularly train its constables in conducting traffic stops, permissible searches and seizures, impremissible searches and seizures.

59. Allowing deputies accused of sexual misconduct to continue to work as deputies.

60. Hiring unqualified deputies or deputy's with a propensity to violate Constitutional rights.

61. Failing to have the proper policies in place to prevent the constitutional violations suffered by Plaintiff as herein described;

62. Multiple instances of sexual misconduct by Harris County and the constables and deputies of the Harris County Constable's establishes that Harris County is legally responsible for the continuous conduct of Brandin Glispy.

63. Conduct that Harris County was on notice of prior sexual assaults claims against its Constable Brandin Glispy.

**IX. HARRIS COUNTY CONSTABLE SYLVIA TREVINO'S SUPERVISOR LIABILITY**

64. Plaintiff incorporates herein the preceding facts in preceding paragraphs.

65. The following acts or omissions of supervisor, Constable Sylvia Trevino violated The Plaintiff's constitutional rights:

66. She participated directly in the alleged constitutional violation by failing to train and re-train her deputies authorizing the illegal traffic stop frisking of The Plaintiff;

67. Constable Trevino failed to remedy the wrong after being informed of the prior violations by Glispy;

68. She created promulgated a policy and custom under which unconstitutional practices occurred the stop and frisk in a routine traffic stop, the failure to train and discipline for sexual misconduct , or allowed the continuance of such a policy or custom;

69. Constable Sylvia Trevino grossly failed to adequately supervise subordinate, Brandin Glispy, who committed the wrongful acts including the traffic stop and frisk without the requisite level of reasonable suspicion, and resulting in the commission of the sexual acts; or

70. She exhibited deliberate indifference to the rights of the plaintiff by failing to act on information indicating that unconstitutional acts were occurring specifically, information of the prior sexual assault of the first female victim by Harris County Constable Brandin Glispy at the Popeye's Restaurant, in January 2017, resulting in the subsequent sexual assault of the Plaintiff.

**X. HARRIS COUNTY CONSTABLE HELIODORO MARTINEZ' SUPERVISOR LIABILITY**

71. Plaintiff incorporates herein the facts in the preceding paragraphs.

***FAILURE TO TRAIN, RETRAIN OR DISCIPLINE & SUPERVISOR LIABILITY***

72. Martinez as policymaker and supervisor of Defendant, Gilspy, he failure to provide the proper training to the deputy personnel is actionable as the cause of harm to plaintiff. A municipality's policy of failure to train" his personnel can give rise to liability under 42 U.S.C. § 1983.52.

73. Plaintiff incorporates herein the facts in preceding paragraphs.

74. The following acts or omissions of immediate supervisor, Harris County Constable Heliodoro Martinez violated Mrs. The Plaintiff's constitutional rights:

75. He participated directly in the alleged constitutional violation by failing to adequately train, regularly train, failure to hire qualified constable;

76. Failed to remedy the wrong after being informed of the violation prior violations, involving sexual assaults by Constable Glispy, including one in January 2017;

77. Constable Martinez created a policy or custom under which unconstitutional practices occurred the stop and frisk in a traffic stop without any reasonable suspicion or probable cause for the stop,

78. The failure to train and discipline for sexual misconduct), or allowed the continuance of such a policy or custom;

79. Constable Heliodoro Martinez was grossly negligent in supervising subordinates (Brandin Glispy) who committed the wrongful acts; or

80. He exhibited deliberate indifference to the rights of the plaintiff by failing to act on information indicating that unconstitutional acts were occurring prior

violations, involving sexual assaults by Constable Glispy, including one in January 2017;

81. Constable Martinez failed to remedy the wrong after being informed of the prior violations, involving sexual assaults by Constable Glispy, including one in January 2017;

82. He created a policy or custom under which allowed the unconstitutional practices occurred the stop and frisk in a traffic stop without any reasonable suspicion or probable cause for the frisk by a male officer on a female detainee, the failure to train and discipline for sexual misconduct , or allowed the continuance of such a policy or custom;

83. The actions of each Defendants was the 'moving force' behind the constitutional violation suffered by Plaintiff.

## XII. LIABILITY OF LYND COMPANY NEGLIGENCE/GROSS NEGLIGENCE

84. Plaintiff incorporates herein the facts in the preceding paragraphs.

85. Defendant, Lynd Company had a duty to exercise the degree of care that a reasonably careful person would use to avoid harm to others under circumstances similar to the facts described herein.

86. The Plaintiff injuries were proximately caused by Defendant's negligent, careless, reckless and outrageous behavior of its agent Benita Albert.

87. Benita Albert an agent of Lynd Company tasked with the responsibility of managing Heatherbrook apartment was aware of Gilspy's abhorrent behavior but

did nothing to stop it, prevent it, or report it. Lynd assisted him a by concealing his predatory actions after her tenant, Ms. Regains reported him to her management company employee Albert.

88. Lynd owed a duty to the general public including the Plaintiff to warn about its off duty officer's criminal behavior.

XIII. DEMAND FOR JURY TRIAL

89. Plaintiff hereby demands a trial by jury pursuant to FRCP 5(d) and 38(b).

XIX. REQUEST FOR DISCLOSURE PURSUANT TO TEX. R. CIV. PROC. RULE 194

90. Plaintiff seeks disclosures from each defendant in this case.

XX. DAMAGES

91. As a result of Defendant's conduct, Plaintiff seek relief for damages which includes, but is not limited to: (1) compensatory damages, actual damages, general damages against each Defendant, jointly and severally, in the amount proven at trial.

92. Plaintiff seeks (2) punitive damages as allowed by law, (3) court costs, expenses, expert witness fees and attorney's fees under Texas Civil Practice and Remedies Code and 42 U.S.C. §§ 1988 and 1983; (4) prejudgment and postjudgment interest as allowed by law; and (5) such other relief, legal or equitable, as may be warranted or to which Plaintiff is entitled.

93. Harris county be made to apologize and to promulgate, adopt, train, maintain and enforce appropriate policies to prevent future instances of the type of sexual

misconduct described herein; (6) Mental Anguish suffered by The Plaintiff during the sexual assault until the present; (7) Mental Anguish sustained by Plaintiff's children as a result of the sexual assault of his daughter including, but not limited to pain, the emotional pain, torment, and suffering that Plaintiff, would, in reasonable probability experience from the incident.

94. Physical pain and suffering sustained by The Plaintiff from the time of the sexual assault to its conclusion;

95. Reasonable and necessary medical expenses, from the time of the incident.

#### XXI. PUNITIVE DAMAGES

96. Plaintiff request punitive damages against Harris County Constable, Sylvia Trevino, Brandi Gilspy, Heliodoro Martinez, Lynd Company in amount be determined at trial; Punitive damages based on the willful, reckless and malicious conduct of defendants. The acts were done recklessly or with callous indifference to the constitutionally protected rights of Plaintiff.

97. Plaintiff sexual assault resulted from the joint and several acts of Defendants for which Plaintiff seeks punitive damages from Harris County, Harris County Constable, Sylvia Trevino in an amount appropriate to punish each individual Defendant, and deter others from engaging in similar conduct; Award punitive damages against Sylvia Trevino, Harris County Constable and Harris County and Lynd Company in an amount shown at trial.

#### XIII. PRESERVATION OF EVIDENCE/SPOLIATION NOTICE

98. Plaintiff sent a letter of preservation on or about March 14, 2019, and hereby request and demand that Defendant's preserve and maintain all evidence pertaining to any claim or defense related to the incident made the basis of this lawsuit, or the damages resulting therefrom. Failure to maintain such items shall constitute a "spoliation" of the evidence.

#### XIV. PRAYER

99. WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully pray that Defendants Brandin Glispy, Sylvia Trevino, Heliodoro Martinez, Harris County Constables, appear and answer herein, and that upon a final hearing of this cause, that judgment be entered for the Plaintiff and against Defendants, both jointly and severally, for all damages requested herein, together with prejudgment and post-judgment interest at the maximum rate allowed by law, attorney's fees, costs of court, and such other and further relief to which Plaintiff may be entitled at law or in equity.

100. Punish each individual Defendant, and deter others from engaging in similar conduct;

101. Plaintiff asserts that her sexual assault was the result of government actors, Sylvia Trevino, Brandin Glispy, Heliodoro Martinez, Harris County Constables, Harris County and its Policy makers and the harm suffered was the result of Defendants' willful, reckless, malicious conduct motivated by evil motive or intent, or done recklessly or with callous indifference to the constitutionally protected rights of Plaintiff, and hereby entitles Plaintiff to punitive/exemplary damages.

Equitable relief, including, without limitation, that Harris County and Constables Trevino, Glispy and Martinez be made to apologize and to promulgate, adopt, train, maintain and enforce appropriate policies to prevent future instances of the type of sexual misconduct described herein; Such other relief, including injunctive and/or declaratory relief, as the court may deem proper.

Respectfully Submitted,  
The Lewis Law Group, PLLC  
By: /s/ U.A. Lewis  
U.A. Lewis  
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Email: myattorneyatlaw@gmail.com  
Attorney-in-charge

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I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office this April 9, 2019

Certified Document Number: 84350765 Total Pages: 16

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**

FOR EACH PARTY SERVED YOU MUST FURNISH ONE (1) COPY OF THE PLEADING  
FOR WRITS FURNISH TWO (2) COPIES OF THE PLEADING PER PARTY TO BE SERVEDCASE NUMBER: 201919321CURRENT COURT: 281**TYPE OF INSTRUMENT TO BE SERVED** (See Reverse For Types): ORIGINAL PETITION/CITATION**FILE DATE OF MOTION:** 03 / 13 / 2019  
Month/ Day/ Year**SERVICE TO BE ISSUED ON** (Please List Exactly As The Name Appears In The Pleading To Be Served):1. NAME: Sylvia Trevino  
ADDRESS: 5900 Canal Street Houston, Texas 77011  
AGENT, (if applicable): \_\_\_\_\_**TYPE OF SERVICE/PROCESS TO BE ISSUED** (see reverse for specific type):**SERVICE BY** (check one):

<input type="checkbox"/> ATTORNEY PICK-UP	<input checked="" type="checkbox"/> CONSTABLE
CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____ Phone: _____	
<input type="checkbox"/> MAIL	<input type="checkbox"/> CERTIFIED MAIL-DISTRCIT CLERK'S OFFICE
<input type="checkbox"/> Type of Publication:	<input type="checkbox"/> COURTHOUSE DOOR, or NEWSPAPER OF YOUR CHOICE:
<input type="checkbox"/> OTHER, explain _____	

2. NAME: Brandin Glipsy  
ADDRESS: 5900 Canal Street Houston, Texas 77011  
AGENT, (if applicable): \_\_\_\_\_**TYPE OF SERVICE/PROCESS TO BE ISSUED** (see reverse for specific type): ORIGINAL PETITION/CITATION**SERVICE BY** (check one):

<input type="checkbox"/> ATTORNEY PICK-UP	<input type="checkbox"/> CONSTABLE
CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____ Phone: _____	
<input type="checkbox"/> MAIL	<input checked="" type="checkbox"/> CERTIFIED MAIL-DISTRCIT CLERK'S OFFICE
<input type="checkbox"/> PUBLICATION:	<input type="checkbox"/> COURTHOUSE DOOR, or NEWSPAPER OF YOUR CHOICE:
Type of Publication:	<input type="checkbox"/>
<input type="checkbox"/> OTHER, explain _____	

**ATTORNEY (OR ATTORNEY'S AGENT) REQUESTING SERVICE:**NAME: U.A. LEWIS TEXAS BAR NO./ID NO: 24076511MAILING ADDRESS: PO BOX 27353 HOUSTON, TX 77227PHONE NUMBER: 713-570-6555 FAX NUMBER: 713-581-1017EMAIL ADDRESS: MYATTORNEYATLAW@GMAIL.COM



## **CIVIL PROCESS REQUEST**

FOR EACH PARTY SERVED YOU MUST FURNISH ONE (1) COPY OF THE PLEADING  
FOR WRITS FURNISH TWO (2) COPIES OF THE PLEADING PER PARTY TO BE SERVED

**CASE NUMBER:** 201919321

**CURRENT COURT:** 281

**TYPE OF INSTRUMENT TO BE SERVED (See Reverse For Types):** ORIGINAL PETITION/CITATION

**FILE DATE OF MOTION:** 03 / 13 / 2019  
Month/ Day/ Year

**SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):**

1. NAME: Harris County  
ADDRESS: 1001 Preston, Suite 911  
AGENT, (if applicable): c/o Harris County Judge Lina Hidalgo

**TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type):**

**SERVICE BY (check one):**

<input type="checkbox"/> <b>ATTORNEY PICK-UP</b>	<input type="checkbox"/> <b>CONSTABLE</b>
<b>CIVIL PROCESS SERVER - Authorized Person to Pick-up:</b> _____	
<input type="checkbox"/> <b>MAIL</b>	<input checked="" type="checkbox"/> <b>CERTIFIED MAIL-DISTRCIT CLERK'S OFFICE</b>
<input type="checkbox"/> Type of Publication:	<b>COURTHOUSE DOOR, or</b> <b>NEWSPAPER OF YOUR CHOICE:</b>
<input type="checkbox"/> _____ <input type="checkbox"/> _____	
<input type="checkbox"/> <b>OTHER, explain</b> _____	

**OTHER**, explain \_\_\_\_\_

2. NAME: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

AGENT, (if applicable): \_\_\_\_\_

**TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type):** ORIGINAL PETITION/CITATION

**SERVICE BY (check one):**

<input type="checkbox"/> <b>ATTORNEY PICK-UP</b>	<input type="checkbox"/> <b>CONSTABLE</b>
<b>CIVIL PROCESS SERVER</b> - Authorized Person to Pick-up: _____ Phone: _____	
<input type="checkbox"/> <b>MAIL</b>	<input type="checkbox"/> <b>CERTIFIED MAIL-DISTRRCIT CLERK'S OFFICE</b>
<input type="checkbox"/> <b>PUBLICATION:</b> Type of Publication: <input type="checkbox"/> <input type="checkbox"/> <b>COURTHOUSE DOOR, or</b> <input type="checkbox"/> <b>NEWSPAPER OF YOUR CHOICE:</b>	
<input type="checkbox"/> <b>OTHER, explain</b> _____	

**ATTORNEY (OR ATTORNEY'S AGENT) REQUESTING SERVICE:**

NAME: U.A. LEWIS TEXAS BAR NO./ID NO: 24076511

MAILING ADDRESS: PO BOX 27353 HOUSTON, TX 77227

PHONE NUMBER: 713-570-6555 FAX NUMBER: 713-581-1017

EMAIL ADDRESS: MYATTORNEYATLAW@GMAIL.COM



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office  
this April 9, 2019

Certified Document Number: 84367159 Total Pages: 3

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**

7018-2290 0001 3523 5769

CAUSE NO. 201919321

02

RECEIPT NO.

75.00

CIM

\*\*\*\*\*

TR # 73605628

PLAINTIFF: JANE DOE (ON BEHALF AND ALSO KNOWN AS M F)  
VS.  
DEFENDANT: TREVINO, SYLVIA

In The 281st  
Judicial District Court  
of Harris County, Texas  
281ST DISTRICT COURT  
Houston, TX

THE STATE OF TEXAS  
County of Harris

CITATION (CERTIFIED)

TO: HARRIS COUNTY MAY BE SERVED BY SERVING HARRIS COUNTY JUDGE LINA  
HIJALGO

1001 PRESTON SUITE 911 HOUSTON TX 77002

Attached is a copy of ORIGINAL PETITION JURY DEMAND AND REQUEST FOR DISCLOSURE

This instrument was filed on the 15th day of March, 2019, in the above cited cause number and court. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED, You may employ an attorney. If you or your attorney do not file a written answer with the District Clerk who issued this citation by 10:00 a.m on the Monday next following the expiration of 20 days after you were served this citation and petition, a default judgment may be taken against you.

TO OFFICER SERVING:

This citation was issued on 25th day of March, 2019, under my hand and seal of said Court.



*Marilyn Burgess*

Issued at request of:  
LEWIS, U. A.  
PO BOX 27353  
HOUSTON, TX 77227  
Tel: (713) 570-6555  
Bar No.: 24076511

MARILYN BURGESS, District Clerk  
Harris County, Texas  
201 Caroline, Houston, Texas 77002  
(P.O. Box 4651, Houston, Texas 77210)

Generated By: MOMON, RHONDA HWP//11188494

CLERK'S RETURN BY MAILING

Came to hand the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, and executed by mailing to Defendant certified mail, return receipt requested, restricted delivery, a true copy of this citation together with an attached copy of ORIGINAL PETITION JURY DEMAND AND REQUEST FOR DISCLOSURE to the following addressee at address:

\_\_\_\_\_

ADDRESS

(a) ADDRESSEE

Service was executed in accordance with Rule 106  
(2) TRCP, upon the Defendant as evidenced by the return receipt incorporated herein and attached hereto at

on \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_,  
by U.S. Postal delivery to \_\_\_\_\_

This citation was not executed for the following reason: \_\_\_\_\_

MARILYN BURGESS, District Clerk  
Harris County, TEXAS

By \_\_\_\_\_, Deputy

RECORDER'S MEMORANDUM

This instrument is of poor quality  
at the time of imaging

\*73605628\*

701.8 2290 0001 3523 5769

CAUSE NO. 201919321

RECEIPT NO.

75.00 CCM

\*\*\*\*\*

TR # 73605628

PLAINTIFF: JANE DOE (ON BEHALF AND ALSO KNOWN AS M F)  
vs.  
DEFENDANT: TREVINC, SYLVIA

In The 281st  
Judicial District Court  
of Harris County, Texas  
281ST DISTRICT COURT  
Houston, TX

CITATION (CERTIFIED)

THE STATE OF TEXAS  
County of Harris

TO: HARRIS COUNTY MAY BE SERVED BY SERVING HARRIS COUNTY JUDGE LINA  
HILDALGO

1001 PRESTON SUITE 911 HOUSTON TX 77002

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*Marilyn Burgess*

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MARILYN BURGESS, District Clerk  
Harris County, Texas  
201 Caroline, Houston, Texas 77002  
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Generated By: MOMON, RHONDA HWP//11188494

CLERK'S RETURN BY MAILING

2 of 2  
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This citation was not executed for the following reason: \_\_\_\_\_

MARILYN BURGESS, District Clerk  
Harris County, TEXAS

BY \_\_\_\_\_ Deputy



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office this April 9, 2019

Certified Document Number: 84589917 Total Pages: 2

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**

7018 2290 0001 3523 5783

CAUSE NO. 201919321

RECEIPT NO.

75.00

CTM

\*\*\*\*\*

TR # 73605631

PLAINTIFF: JANE DOE (ON BEHALF AND ALSO KNOWN AS M F)  
vs.  
DEFENDANT: TREVINO, SYLVIA

In The 281st  
Judicial District Court  
of Harris County, Texas  
281ST DISTRICT COURT  
Houston, TX

CITATION (CERTIFIED)

THE STATE OF TEXAS  
County of Harris

TO: GLIPSY, BRANDIN  
WHEREVER HE MAY BE FOUND

5900 CANAL STREET HOUSTON TX 77011

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Generated By: MOMON, RHONDA BWP//1118B494

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Harris County, TEXAS

BY \_\_\_\_\_, Deputy

RECORDER'S MEMORANDUM

This instrument is of poor quality  
at the time of imaging

7018 2290 0001 3523 5783

CAUSE NO. 201919321

RECEIPT NO. 75.00 CTM  
\*\*\*\*\* TR # 73605631

PLAINTIFF: JANE DOE (ON BEHALF AND ALSO KNOWN AS M F)  
vs.  
DEFENDANT: TREVINO, SYLVIA

In The 281st  
Judicial District Court  
of Harris County, Texas  
281ST DISTRICT COURT  
Houston, TX

THE STATE OF TEXAS  
County of Harris  
CITATION (CERTIFIED)

TO: GLIPSY, BRANDIN  
WHEREVER HE MAY BE FOUND

5900 CANAL STREET HOUSTON TX 77011

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Generated By: MOMON, RHONDA HWP//11188494

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MARILYN BURGESS, District Clerk  
Harris County, TEXAS

By \_\_\_\_\_, Deputy



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office this April 9, 2019

Certified Document Number: 84589914 Total Pages: 2

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**

7018 2290 0601 3523 5776 12

CAUSE NO. 201919321

RECEIPT NO.

75.00

CTM

\*\*\*\*\*

TR # 73605624

PLAINTIFF: JANE DOE (ON BEHALF AND ALSO KNOWN AS M F)  
vs.  
DEFENDANT: TREVINO, SYLVIA

In The 281st  
Judicial District Court  
of Harris County, Texas  
281ST DISTRICT COURT  
Houston, TX

CITATION (CERTIFIED)

THE STATE OF TEXAS  
County of Harris

TO: LYND COMPANY MAY BE SERVED BY SERVING THE SECRETARY OF STATE  
30 TRINITY STREET HARTFORD CT 06106-1634  
FORWARD TO:

8900 INTERSTATE HIGHWAY 10 #1200 SAN ANTONIO TX

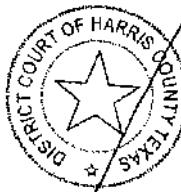
Attached is a copy of ORIGINAL PETITION JURY DEMAND AND REQUEST FOR DISCLOSURE

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*Marilyn Burgess*

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LEWIS, U. A.  
PO BOX 27353  
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Tel: (713) 570-6555  
Bar No.: 24076511

MARILYN BURGESS, District Clerk  
Harris County, Texas  
291 Caroline, Houston, Texas 77002  
(P.O. Box 4651, Houston, Texas 77210)

Generated By: MOMON, RHONDA HWP//11188494

CLERK'S RETURN BY MAILING

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MARILYN BURGESS, District Clerk  
Harris County, TEXAS

By \_\_\_\_\_ Deputy

RECORDER'S MEMORANDUM  
This instrument is of poor quality  
at the time of imaging

2018 2290 0001 3523 5776  
CAUSE NO. 201919321

RECEIPT NO. 75.00 CTM  
\*\*\*\*\* TR # 73605624

PLAINTIFF: JANE DOE (ON BEHALF AND ALSO KNOWN AS M F)  
VS.  
DEFENDANT: TREVINO, SYLVIA

In The 281st  
Judicial District Court  
of Harris County, Texas  
281ST DISTRICT COURT  
Houston, TX

THE STATE OF TEXAS  
County of Harris  
CITATION (CERTIFIED)

TO: LYND COMPANY MAY BE SERVED BY SERVING THE SECRETARY OF STATE  
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Generated By: MOMON, RONDA HWP//11188494

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By \_\_\_\_\_ Deputy

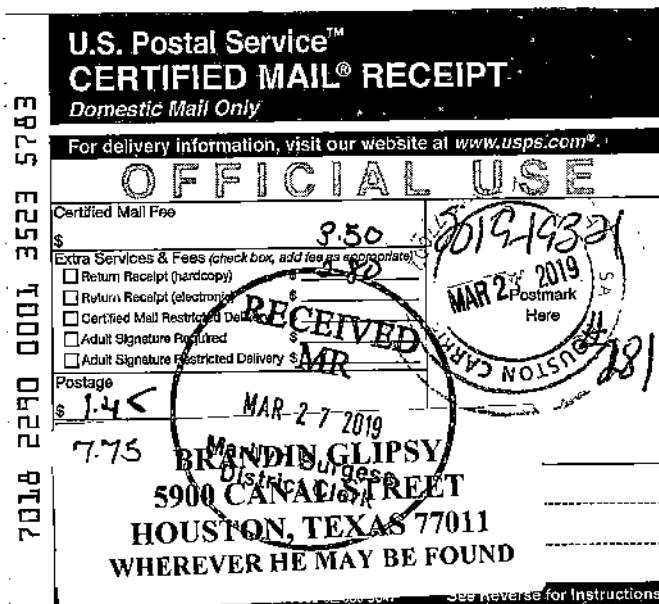


I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office  
this April 9, 2019

Certified Document Number: 84589909 Total Pages: 2

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail support@hcdistrictclerk.com**



**RECORDER'S MEMORANDUM**  
This instrument is of poor quality  
at the time of imaging.



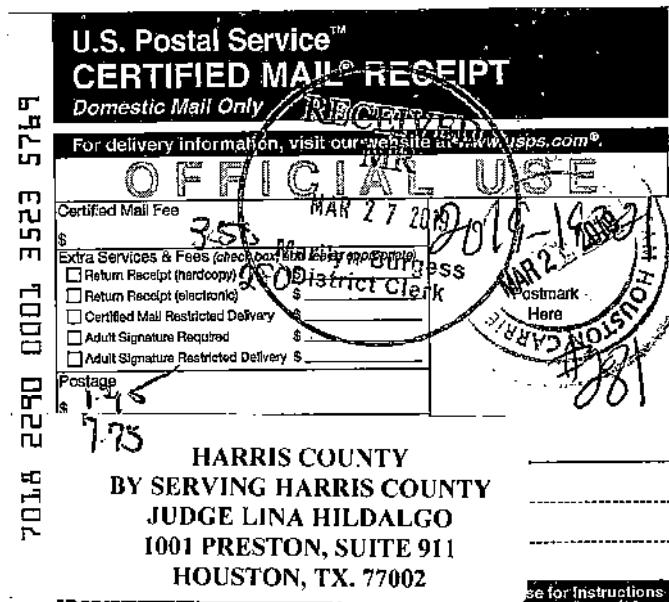
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Certified Document Number: 84649041 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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2019-19321



**RECORDER'S MEMORANDUM**  
This instrument is of poor quality  
at the time of imaging.



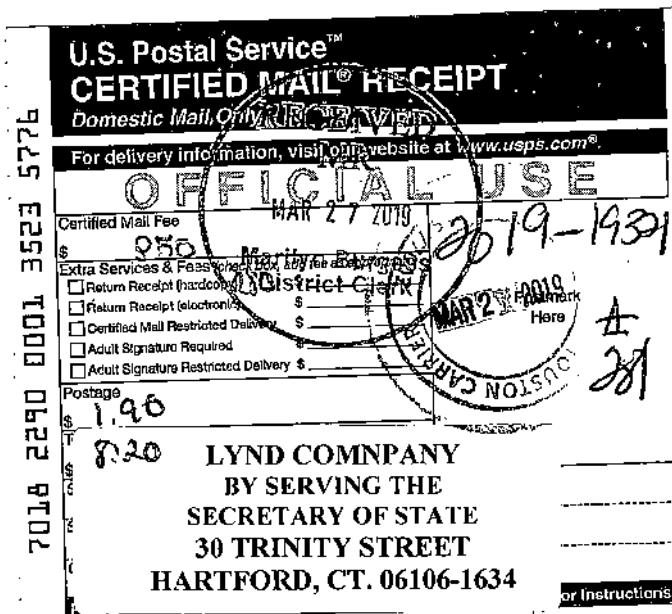
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Witness my official hand and seal of office  
this April 9, 2019

Certified Document Number: 84649038 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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2019-19321



03-27-19

**RECORDER'S MEMORANDUM**  
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at the time of imaging.



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
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Certified Document Number: 84649037 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK  
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## Constable Return of Individual

Cause #: 201919321

Tracking #: 73605629

In the case of JANE DOE (ON BEHALF AND ALSO KNOWN AS M F) VS Trevino, SYLVIA a CITATION and attached ORIGINAL PETITION was issued by the 281st Judicial District court of HARRIS County, TX and came to hand on the 26 day of March, 2019 at 11:12AM to be delivered at 5900 CANAL ST, HOUSTON, Tx 77011 by delivering to: Trevino, SYLVIA

(Attempted service at **5900 CANAL ST, HOUSTON, Tx, 77011** unless otherwise noted.)

Date	Time	Deputy Name	Agency	Service Attempt Type	Attempted Address	Remarks
3/27/2019	9:00:00 AM	Jose Zavala	6	SERVED DEFENDANT	5900 CANAL ST HOUSTON Tx 77011	

### Service of Individual

Executed in HARRIS County, Texas by delivering to each of the within name defendant by PERSONAL ; a true copy of this CITATION together with the accompanying copy of the ORIGINAL PETITION , at the following times and places:

Name	Date	Time	Full Address of Service
Trevino, SYLVIA	3/27/2019	9:00AM	5900 CANAL ST HOUSTON Tx 77011

Fee Due \$ 75.00

by Deputy Jose Zavala - 86S08

Printed

Deputy Signature 

Attempts: 0

Total Attempts: 1

**Silvia Trevino , Constable Precinct #6**

**Harris County Texas**

5900 Canal Street  
Houston Texas 77011  
713.274.3400



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office this April 9, 2019

Certified Document Number: 84714203 Total Pages: 2

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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2019.19321

P.19



Marilyn Burgess  
HARRIS COUNTY DISTRICT CLERK

P.O. BOX 4651  
HOUSTON, TEXAS 77210-4651



RECORDED

04-01-19

FILED  
MARILYN BURGESS  
HARRIS COUNTY DISTRICT CLERK  
HARRIS COUNTY, TEXAS

BRANDIN GLIPSY  
5900 CANAL STREET  
HOUSTON, TEXAS 77011  
WHEREVER HE MAY BE FOUND

Refused  
3/29/19

281st

<b>SENDER COMPLETE THIS SECTION</b>	
<b>COMPLETE THIS SECTION ONLY IF YOU ARE A RECIPIENT</b>	
<p>1. Article Addressed to:</p> <p><i>7/14/14 21 10:01</i></p>	
<p>2. Article Number (Transfer from service label)</p> <p><i>7018 2290 0001 3523 5783</i></p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail <input type="checkbox"/> Certified Mail Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Mail Restricted Delivery <input type="checkbox"/> Mail Restricted Delivery</p>	
<p>4. Signature</p> <p><input checked="" type="checkbox"/> Agent <input type="checkbox"/> Address</p> <p><input type="checkbox"/> Received by Printed Name <input type="checkbox"/> Date of Delivery</p>	
<p>5. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below:</p>	
<p>6. Domestic Return Receipt</p>	

PS Form 3811, July 2015 PSN 7580-02-000-9053

RECEIPT NO.

75.00 CTM

\*\*\*\*\*

TR # 73605631

PLAINTIFF: JANE DOE (ON BEHALF AND ALSO KNOWN AS M F)  
vs.  
DEFENDANT: TREVINO, SYLVIA

In The 281st  
Judicial District Court  
of Harris County, Texas  
281ST DISTRICT COURT  
Houston, TX

## CITATION (CERTIFIED)

THE STATE OF TEXAS  
County of Harris

TO: GLIPSY, BRANDIN  
WHEREVER HE MAY BE FOUND

5900 CANAL STREET HOUSTON TX 77011

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Generated By: MOMON, RHONDA EWP//11168494

Page 3 of 19  
84714207-1

## CLERK'S RETURN BY MAILING

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by U.S. Postal delivery to \_\_\_\_\_

This citation was not executed for the following reason:

MARILYN BURGESS, District Clerk  
Harris County, TEXAS

By \_\_\_\_\_, Deputy

2019-19321 / Court: 281

CAUSE NO. \_\_\_\_\_

JANE DOE on behalf of M.F.,  
*Plaintiff*

v.

HARRIS COUNTY PRECINCT SIX  
CONSTABLE SYLVIA TREVINO,  
BRANDIN GLISPY, and HELIODORO  
MARTINEZ,  
In their individual capacities,  
HARRIS COUNTY, and THE LYND  
COMPANY,  
*Defendants*

§ IN THE DISTRICT COURT

§ \_\_\_\_\_ TH JUDICIAL DISTRICT

§ HARRIS COUNTY, TEXAS

ORIGINAL PETITION, JURY DEMAND AND REQUEST FOR DISCLOSURE

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, Plaintiff, Jane Doe on behalf and also known as M.F. ("Doe") in the above-styled and numbered cause, and files this, her Original petition, complaining of Harris County Constables Sylvia Trevino ("Trevino"), and Heliodoro Martinez ("Martinez") in their individual capacities and former Harris County Precinct Six Deputy Constable, Brandin Glispy ("Glispy"), in his individual capacity and The Lynd Company ("Lynd") for cause of action would show as follows:

I. INTRODUCTION

Former Juvenile Detention Officer and Harris County constable sexually assaulted multiple women, including Pregnant woman during a traffic stop. He was hired by Constable Heliodoro Martinez, He remained on the job as a Deputy, for Constable Sylvia Trevino and worked as an off-duty officer for Lynd Property Management,

each were aware of the complaints by other women of sexual abuse, but failed to terminate or report him for his proclivities which allowed his spree to continue. Glispy's misdeeds were ultimately reported by his victim herein, he tried and convicted of sexual assault and sentenced to 8 yrs in TDCJ. Glispy is one of two Harris County Precinct Six Deputy Constables recently accused of sexually assaulting woman while acting under the color of law, Edward Joe Mata was the latest deputy indicted. The Plaintiff has suffered extreme pain and suffering, and mental anguish as a result of the defendants actions, and inactions.

## II. JURISDICTION AND VENUE

1. The subject matter in controversy is within the jurisdictional limits of this court. This court has jurisdiction over the parties because Defendants are Texas residents.
2. Venue is proper because all Defendants in this action are residents of Harris County, Texas or do business in this State. Venue is also proper because a substantial part of the events or omissions giving rise to the Plaintiffs' claims occurred in this judicial district—i.e., at 5800 Martin Luther King Drive, Houston, Texas 77021. Therefore, venue is proper.
3. All conditions precedent to filing this lawsuit have been met.

## III. PARTIES

4. The Plaintiff, M.F., Doe herein is an individual who resides in Harris County, Texas.

5. Defendant, Sylvia Trevino was at all times relevant to this action the duly elected Constable of Harris County Texas. She was employed by Harris County as a Constable of the Harris County Constable's office. Defendant, Sylvia Trevino is sued in her individual capacity, acting under color of law. Constable Trevino is a "person" under 42 U.S.C. § 1983 and at all times relevant to this case acted under color of law. She is a county policy maker with respect to policies, custom, practices and procedures at the Harris County Constable's Office. Defendant, Harris County Constable Sylvia Trevino was acting in the course and scope of her employment with defendant, Harris county as a constable caused the injuries which are the subject of the claim; She may be served with process wherever she may be found.

6. Defendant, Harris County is a unit of local government organized under the laws of the State of Texas. Defendant is a "person" under 42 U.S.C. § 1983 and at all times relevant to this case acted under color of law. Harris County may be served with process by serving the duly elected County Judge of Harris County, Lina Hidalgo, at , Houston, Texas 77002.

7. Defendant, Heliodoro Martinez is a former employee of the Harris County Constable, he is being sued in his individual capacity, as a supervisor, who was acting in the course and scope of his employment with defendant, Harris county. He is an individual while acting under color of law and acting in his individual capacity

as a deputy constable and supervisor of Brandin Gilspy, acting in the course and scope of his duties caused the injuries which are the subject of the claim; may be served with process wherever he may be found.

8. Defendant, Lynd Company, is a management company that can is located at 8000 INTERSTATE HIGHWAY 10 #1200 SAN ANTONIO TX; Defendant, Lynd Company may be served with process through its registered agent SECRETARY OF THE STATE, 30 TRINITY STREET, HARTFORD, CT 06106-1634.

9. Defendant, Brandin Glipsy is a former employee of the Harris County Constable, he is being sued in his individual capacity, who was acting in the course and scope of his employment with defendant, Harris county. He is an individual while acting under color of law and acting in his individual capacity as a deputy constable caused the injuries which are the subject of the claim; may be served with process and may be served with process wherever he may be found.

#### IV. FACTS

10. The Plaintiff was a pregnant mother looking forward to the upcoming birth of her third child.

11. On or about April 24, 2017 at 9 pm a Harris County Constable Brandin Glispy sexually assaulted the pregnant woman during the course of what was suppose to be a routine traffic stop in Houston in 2017.

12. Constable Glispy was driving a marked patrol car with insignia of the Constable office.

13. The driver was advised the reason or purpose for the traffic stop was she had a broken headlight, as is required by law.
14. Rather than give her a ticket he told the expecting mother to stand outside of the vehicle in the 5800 block of Martin Luther King, but eventually allowed to her leave without a ticket or warning.
15. Constable Glispy then stopped her a second time but he saw people milling about so he allowed her to continue on.
16. He stopped her a third time and directed her to a dark secluded gravel lot next to an abandoned building.
17. Concerned but wanting to comply with the officer's command she pulled into the dark parking lot.
18. The officer then used his constable vehicle to obstruct the view of the woman from the street traffic.
19. He exited his vehicle wearing his full uniform, including his gun.
20. He also requested she perform oral sex; however, she refused.
21. Constable Glispy began to frisk the female detainee
22. He became to grope her body then penetrate her vagina.
23. Shocked by what was happening to her she looked for a badge number or name but neither was visible.
24. During the entire exchanged he managed to conceal his name and number badge.

25. After he was finished, but before he allowed her to leave, he hand wrote his phone number on a piece of paper from his constable notepad and provided it to the pregnant woman.
26. Although she was upset, she gladly accepted his phone number for the purpose of identifying him later.
27. She was allowed to leave without further incident.
28. No arrest, no citation, no paperwork noting that the detention ever took place.
29. The Plaintiff still in shock arrived home and immediately called 911 and reported the sexual assault to the operator.
30. Deputy Glispy was arrested and later charged with sexual assault on July 5, 2017.
31. At trial, a jury sentenced Glispy to eight years in prison.
32. It took less than 3 hours to reach a verdict.
33. According to prosecutors Brandin Glispy assaulted at least two women in the six months he was on the job.
34. There may be more women assaulted by Gilspy, since he worked at the juvenile detention center, and for Houston Housing authority .
35. Gilspy had a reputation around Heatherbrook apartments where he held an off duty extra job assignment of sexually harassing female tenants.
36. Four months earlier in January 2017, the deputy cornered another woman in the restroom of a Popeye's chicken restaurant.

37. He sexually assaulted her, and then attempted to force his first known victim to perform oral sex, prosecutors said.

38. Then she was able to get away, and she testified against Glispy during the punishment phase of his trial for the sexual assault of the Plaintiff.

39. She also reported his actions to Heatherbrook apartment management, Lynd.

40. Although the victim in the previous incident of sexual assault reported to Lynd management, nothing was done to Glispy; he was allowed to stay out there and hunt for other women.

41. The county inaction amounted to ratifying, accepting and condoning the criminal conduct of Glispy.

42. With a license to continue, Glispy sexually assaulted the pregnant The Plaintiff.

43. He remained on duty for three additional days after the last allegation.

44. Lynd Company concealed the sexual harrasment and assualt allegations against Gilspy, thereby ratifying his conduct.

45. Defendants are jointly and severally liable for the injuries and damages sustained by Plaintiff.

**V. BRANDIN GLISPY LIABILITY FOR CIVIL RIGHTS VIOLATIONS UNDER SECTION 1983**

46. Plaintiff incorporates herein the facts in the preceding numbered-paragraph four.

47.

VI. HARRIS COUNTY LIABILITY CIVIL RIGHTS VIOLATIONS UNDER SECTION 1983

48. Plaintiff incorporates herein the facts in the preceding paragraphs.
49. Failure to train, or re-train, failure to discipline

VII. RATIFICATION--HARRIS COUNTY

50. Plaintiff incorporates herein the facts in the preceding paragraphs.
51. Harris County fully investigated the sexual assault allegations of Glispy, including the assault in January 2017 in the Popeye's restaurant, yet it did nothing to discipline any of their employees involved.
52. Despite certainly knowing of the outrageous behavior of Brandin Glispy sexually assaulting and stalking another female nothing was done to discipline anyone involved thereby constituting ratification of the actions and inactions.

VIII. HARRIS COUNTY'S LIABILITY UNDER MONELL CLAIM, CUSTOM, POLICY, PATTERN AND PRACTICE

53. Plaintiff incorporates herein the facts in the preceding paragraphs.
54. Brandin Glispy committed the same type of wrongful sexual conduct and had the propensity for engaging in future sexual misconduct.
55. Harris County was informed of the previous sexual assault in the Popeye's Restaurant and did nothing to Brandin Glispy in January 2017 when they were informed and placed on notice of the first sexual assault.
56. Yet, Harris county did nothing to Brandin Gilspy; resulting in the additional sexual assaults. Harris County ratified and condoned the sexual conduct of Constable Glispy.

57. Harris County has a custom, policy, practice and procedure of: condoning criminal conduct of its deputies including the stopping and frisking of citizens, without probable cause or a reasonable suspicions of a criminal violation of the law or the sexual misconduct.

58. Failing to adequately train or re-train or regularly train its constables in conducting traffic stops, permissible searches and seizures, impremissible searches and seizures.

59. Allowing deputies accused of sexual misconduct to continue to work as deputies.

60. Hiring unqualified deputies or deputy's with a propensity to violate Constitutional rights.

61. Failing to have the proper policies in place to prevent the constitutional violations suffered by Plaintiff as herein described;

62. Multiple instances of sexual misconduct by Harris County and the constables and deputies of the Harris County Constable's establishes that Harris County is legally responsible for the continuous conduct of Brandin Glispy.

63. Conduct that Harris County was on notice of prior sexual assaults claims against its Constable Brandin Glispy.

**IX. HARRIS COUNTY CONSTABLE SYLVIA TREVINO'S SUPERVISOR LIABILITY**

64. Plaintiff incorporates herein the preceding facts in preceding paragraphs.

65. The following acts or omissions of supervisor, Constable Sylvia Trevino violated The Plaintiff's constitutional rights:

66. She participated directly in the alleged constitutional violation by failing to train and re-train her deputies authorizing the illegal traffic stop frisking of The Plaintiff;

67. Constable Trevino failed to remedy the wrong after being informed of the prior violations by Glispy;

68. She created promulgated a policy and custom under which unconstitutional practices occurred the stop and frisk in a routine traffic stop, the failure to train and discipline for sexual misconduct , or allowed the continuance of such a policy or custom;

69. Constable Sylvia Trevino grossly failed to adequately supervise subordinate, Brandin Glispy, who committed the wrongful acts including the traffic stop and frisk without the requisite level of reasonable suspicion, and resulting in the commission of the sexual acts; or

70. She exhibited deliberate indifference to the rights of the plaintiff by failing to act on information indicating that unconstitutional acts were occurring specifically, information of the prior sexual assault of the first female victim by Harris County Constable Brandin Glispy at the Popeye's Restaurant, in January 2017, resulting in the subsequent sexual assault of the Plaintiff.

**X. HARRIS COUNTY CONSTABLE HELIODORO MARTINEZ' SUPERVISOR LIABILITY**

71. Plaintiff incorporates herein the facts in the preceding paragraphs.

***FAILURE TO TRAIN, RETRAIN OR DISCIPLINE & SUPERVISOR LIABILITY***

72. Martinez as policymaker and supervisor of Defendant, Gilspy, his failure to provide the proper training to the deputy personnel is actionable as the cause of harm to plaintiff. A municipality's policy of failure to train" his personnel can give rise to liability under 42 U.S.C. § 1983.52.

73. Plaintiff incorporates herein the facts in preceding paragraphs.

74. The following acts or omissions of immediate supervisor, Harris County Constable Heliodoro Martinez violated Mrs. The Plaintiff's constitutional rights:

75. He participated directly in the alleged constitutional violation by failing to adequately train, regularly train, failure to hire qualified constable;

76. Failed to remedy the wrong after being informed of the violation prior violations, involving sexual assaults by Constable Glispy, including one in January 2017;

77. Constable Martinez created a policy or custom under which unconstitutional practices occurred the stop and frisk in a traffic stop without any reasonable suspicion or probable cause for the stop,

78. The failure to train and discipline for sexual misconduct), or allowed the continuance of such a policy or custom;

79. Constable Heliodoro Martinez was grossly negligent in supervising subordinates (Brandin Glispy) who committed the wrongful acts; or

80. He exhibited deliberate indifference to the rights of the plaintiff by failing to act on information indicating that unconstitutional acts were occurring prior

violations, involving sexual assaults by Constable Glispy, including one in January 2017;

81. Constable Martinez failed to remedy the wrong after being informed of the prior violations, involving sexual assaults by Constable Glispy, including one in January 2017;

82. He created a policy or custom under which allowed the unconstitutional practices occurred the stop and frisk in a traffic stop without any reasonable suspicion or probable cause for the frisk by a male officer on a female detainee, the failure to train and discipline for sexual misconduct , or allowed the continuance of such a policy or custom;

83. The actions of each Defendants was the 'moving force' behind the constitutional violation suffered by Plaintiff.

#### XII. LIABILITY OF LYND COMPANY NEGLIGENCE/GROSS NEGLIGENCE

84. Plaintiff incorporates herein the facts in the preceding paragraphs.

85. Defendant, Lynd Company had a duty to exercise the degree of care that a reasonably careful person would use to avoid harm to others under circumstances similar to the facts described herein.

86. The Plaintiff injuries were proximately caused by Defendant's negligent, careless, reckless and outrageous behavior of its agent Benita Albert.

87. Benita Albert an agent of Lynd Company tasked with the responsibility of managing Heatherbrook apartment was aware of Gilspy's abhorrent behavior but

did nothing to stop it, prevent it, or report it. Lynd assisted him a by concealing his predatory actions after her tenant, Ms. Regains reported him to her management company employee Albert.

88. Lynd owed a duty to the general public including the Plaintiff to warn about its off duty officer's criminal behavior.

### XIII. DEMAND FOR JURY TRIAL

89. Plaintiff hereby demands a trial by jury pursuant to FRCP 5(d) and 38(b).

### XIX. REQUEST FOR DISCLOSURE PURSUANT TO TEX. R. CIV. PROC. RULE 194

90. Plaintiff seeks disclosures from each defendant in this case.

### XX. DAMAGES

91. As a result of Defendant's conduct, Plaintiff seek relief for damages which includes, but is not limited to: (1) compensatory damages, actual damages, general damages against each Defendant, jointly and severally, in the amount proven at trial.

92. Plaintiff seeks (2) punitive damages as allowed by law, (3) court costs, expenses, expert witness fees and attorney's fees under Texas Civil Practice and Remedies Code and 42 U.S.C. §§ 1988 and 1983; (4) prejudgment and postjudgment interest as allowed by law; and (5) such other relief, legal or equitable, as may be warranted or to which Plaintiff is entitled.

93. Harris county be made to apologize and to promulgate, adopt, train, maintain and enforce appropriate policies to prevent future instances of the type of sexual

misconduct described herein; (6) Mental Anguish suffered by The Plaintiff during the sexual assault until the present; (7) Mental Anguish sustained by Plaintiff's children as a result of the sexual assault of his daughter including, but not limited to pain, the emotional pain, torment, and suffering that Plaintiff, would, in reasonable probability experience from the incident.

94. Physical pain and suffering sustained by The Plaintiff from the time of the sexual assault to its conclusion;

95. Reasonable and necessary medical expenses, from the time of the incident.

#### XXI. PUNITIVE DAMAGES

96. Plaintiff request punitive damages against Harris County Constable, Sylvia Trevino, Brandi Gilspy, Heliodoro Martinez, Lynd Company in amount be determined at trial; Punitive damages based on the willful, reckless and malicious conduct of defendants. The acts were done recklessly or with callous indifference to the constitutionally protected rights of Plaintiff.

97. Plaintiff sexual assault resulted from the joint and several acts of Defendants for which Plaintiff seeks punitive damages from Harris County, Harris County Constable, Sylvia Trevino in an amount appropriate to punish each individual Defendant, and deter others from engaging in similar conduct; Award punitive damages against Sylvia Trevino, Harris County Constable and Harris County and Lynd Company in an amount shown at trial.

#### XIII. PRESERVATION OF EVIDENCE/SPOLIATION NOTICE

98. Plaintiff sent a letter of preservation on or about March 14, 2019, and hereby request and demand that Defendant's preserve and maintain all evidence pertaining to any claim or defense related to the incident made the basis of this lawsuit, or the damages resulting therefrom. Failure to maintain such items shall constitute a "spoliation" of the evidence.

#### XIV. PRAYER

99. WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully pray that Defendants Brandin Glispy, Sylvia Trevino, Heliodoro Martinez, Harris County Constables, appear and answer herein, and that upon a final hearing of this cause, that judgment be entered for the Plaintiff and against Defendants, both jointly and severally, for all damages requested herein, together with prejudgment and post-judgment interest at the maximum rate allowed by law, attorney's fees, costs of court, and such other and further relief to which Plaintiff may be entitled at law or in equity.

100. Punish each individual Defendant, and deter others from engaging in similar conduct;

101. Plaintiff asserts that her sexual assault was the result of government actors, Sylvia Trevino, Brandin Glispy, Heliodoro Martinez, Harris County Constables, Harris County and its Policy makers and the harm suffered was the result of Defendants' willful, reckless, malicious conduct motivated by evil motive or intent, or done recklessly or with callous indifference to the constitutionally protected rights of Plaintiff, and hereby entitles Plaintiff to punitive/exemplary damages.

Equitable relief, including, without limitation, that Harris County and Constables Trevino, Glispy and Martinez be made to apologize and to promulgate, adopt, train, maintain and enforce appropriate policies to prevent future instances of the type of sexual misconduct described herein; Such other relief, including injunctive and/or declaratory relief, as the court may deem proper.

Respectfully Submitted,  
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I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office this April 9, 2019

Certified Document Number: 84714207 Total Pages: 19

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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